

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,	)	No. CR18-292-JCC
	)	
Plaintiff,	)	
	)	RESPONSE TO GOVERNMENT'S
v.	)	MOTION TO SEAL
	)	
JOSEPH ALLEN,	)	
	)	
Defendant.	)	

The defense opposes the government's request to seal Exhibits 3, 4, and 5 accompanying the government's response to the defendant's motion to compel because Officer Nelson's conduct at the Auburn Police Department is of public concern. On September 11, 2017, an inquest into the death of Isaiah Obet was opened in King County District Court before the Honorable Judge Mahoney. Exhibit 1. The proceedings were initially put on hold but are now proceeding, meaning the Auburn Police Department's assessment of Nelson's conduct is in question. Exhibit 2. To the extent the government wants to protect the privacy interests of the parties unrelated to the litigation in this case, they can redact those names under the local rules. It should be noted that these records are public records.

DATED this 17th day of May, 2019.

*s/ Mohammad Ali Hamoudi*  
*s/ Christopher Sanders*  
Assistant Federal Public Defenders  
Attorneys for Joseph Allen

1 **CERTIFICATE OF SERVICE**

2 I certify that on May 17, 2019 I electronically filed the foregoing document with  
3 the Clerk of the Court using the CM/ECF system, which will send notification of filing  
4 to all registered parties.

5 s/ *Suzie Strait*  
6 Paralegal  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26